



# Indiana Department of Education

Dr. Katie Jenner, Secretary of Education

## MEMORANDUM

**TO:** Indiana State Board of Education  
**FROM:** Office of School Accountability, Indiana Department of Education  
**RE:** Accreditation Petition for International Soccer Academy of America (ISAA)  
**DATE:** July 14, 2021

This memorandum provides a summary of the information provided by the school in the petition and in any submitted revisions, as well as the Department's comments regarding the accreditation of ISAA.

### **Background & Demographic Information**

International Soccer Academy of America (ISAA) is a high school serving ninth through twelfth grade located in Mishawaka. ISAA intends to open as an in-person school, serving the communities of "...St. Joseph County students, as well as surrounding counties including Elkhart, LaPorte, and southwest Michigan." ISAA currently does not hold accreditation with any accrediting organization and is not affiliated with any academically focused affiliate organization.

ISAA states its mission is "...to provide an environment that is both educational and soccer-centered, a place where the committed soccer player can excel both on and off the field. We aim to reveal a professional soccer culture and environment to our student-athletes, paving the way to help them achieve their potential." ISAA's vision is "...to develop young women and men into high IQ soccer players, focusing upon the goal of changing the way soccer is generally played in the United States."

ISAA intends to serve between 50 to 75 students in grades nine (9) through twelve (12) upon opening, but ultimately does not intend to expand to serve additional grade levels or exceed its target student population of 150 students.

### **Operations**

***Facilities:*** ISAA currently operates in a building located at 205 W. Edison Rd., Mishawaka, IN, 46545. ISAA has provided documentation verifying that the facility meets Department standards for student occupancy.

***Tuition:*** ISAA did not directly provide the Department with a specific cost for tuition in their application or revisions when requested. ISAA has indicated that if accredited, it intends to participate in the Indiana Choice Scholarship program.

***Staffing:*** ISAA's current Head of School is Ethan Hunt. ISAA currently employs five (5) teachers, three (3) of which currently hold a valid Indiana teaching license. ISAA expressed that it intends to hire more teachers in the future, with preference given towards applicants that hold valid Indiana teaching licenses. ISAA has provided assurances indicating it will utilize the services of an Indiana-licensed teacher to administer state assessments.

### **Academic Programming**

***Curriculum and Instruction:*** ISAA utilizes McGraw-Hill, Holt-McDougall, and Pearson as its curriculum providers for Algebra I and II, Geometry, and Precalculus, respectively. For the remainder of the subjects taught at ISAA, ISAA utilizes its own self-developed curriculum, which



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ISAA assures will "...follow the Indiana Core 40 requirements." ISAA did not provide information on how it ensures its curriculum is aligned to Indiana Academic Standards to the Department.

For assessment, ISAA also indicates it utilizes teacher-created assessments to assess student growth and mastery, stating "...ISAA's formative/benchmark assessment program will depend upon the class and teacher. The assessment may vary depending on the class, lesson, and length of the unit. Assessments will be both formative and summative, allowing teachers to gauge concept mastery before proceeding. Benchmarks from the Core 40 will be followed as ISAA teachers will ensure each concept denoted on the comprehension sheet needed for continuance to the next lesson is achieved." ISAA did not provide information on how its assessments are created, or how data from assessments is collected and utilized to drive instruction.

ISAA has contracted with Gradelink for its Student Information System (SIS). Gradelink is Indiana Ed-Fi certified with Ed-Fi Data Standards, and ISAA has indicated to the Department that it has capacity to produce and submit all required data reports to the state in an accurate and timely manner.

ISAA describes its main instructional philosophy as "...ISAA will offer both honors and regular courses to meet the needs of students at different academic levels and abilities. The ISAA placement test/entrance exam gives the staff, with reasonable assurance, which classes to place a given student in. We approximate a 10:1 student-to-teach[sic] ratio in year one, which will help with individual student learning. A mandatory 30-minute SAT/ACT tutoring session each day can also be substituted out for a tutoring session in a given subject. IEPs and other academic learning plans will be accommodated. ISAA will follow all Indiana Core 40 graduation requirements to ensure students receive an Indiana diploma pursuant to IC 20-32-4. ISAA will offer virtual summer school, as needed, if a student is in danger of not obtaining the Core 40 requirements."

As part of the seeking accreditation processes, ISAA submitted signed assurances agreeing to comply with all applicable legal standards and required processes for nonpublic schools as part of its provisional accreditation period and understands that its accreditation may be revoked if ISAA fails to meet any or all legal requirements while holding provisional accreditation.

### **Department Comments**

- **Curriculum:** The petition for state accreditation requests the applicant to, "Describe the school's academic standards and curriculum, including the anticipated subjects in which students will receive instruction. Indicate how studies of the core subjects of English/language arts, mathematics, science, and social studies are included in the school's curriculum." In its initial submission, ISAA did not provide any information regarding which curriculum it intended to use, only stating that their instruction will "...follow the Indiana Core 40 requirements," as well as referencing an "attached course catalogue," which Department staff were unable to locate in the original application materials. After reviewing this information, Department staff found the response insufficient because ISAA failed to demonstrate how the curriculum would follow Indiana Core 40 requirements, alignment between its curricular materials, instructional philosophy, and Indiana Academic Standards, and did not provide information on the



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development or use of curriculum. The Department requested further information regarding ISAA's curriculum and provided ISAA with an opportunity to respond to the insufficiencies identified by Department staff. ISAA responded to the Department's requested revisions by providing several documents that ISAA indicated constituted its curriculum. After reviewing the curriculum documents, excluding mathematics, Department staff determined the brief, one (1) to two (2) page documents provided by ISAA did not constitute a curriculum and more closely resembled course descriptions. For mathematics, ISAA provided a half-page bulleted list indicating its math curriculum would utilize McGraw-Hill, Holt-McDougall, and Pearson as its curriculum providers for Algebra I and II, Geometry, and Precalculus, respectively, but did not provide any further information regarding how ISAA intends to incorporate these curricular materials into its instructional philosophy to a degree that led to confirmation of understanding of curriculum structuring. Furthermore, none of the documents provided by ISAA cited any Indiana Academic Standards, and the responses provided indicate that ISAA believes the Indiana Core 40 requirements constitute an academic curriculum, rather than a list of the courses and credits required to earn an Indiana diploma. After reviewing ISAA's response, the response was insufficient because ISAA could not adequately address any of the Department staff's concerns regarding its curriculum in its revisions, nor demonstrate how the school would effectively incorporate curricular materials into its instructional philosophy to a degree that led to confirmation of understanding curriculum structuring, much less a curriculum aligned to Indiana Academic Standards.

- **Assessment:** The petition for state accreditation requests the applicant to, "Describe the school's formative/benchmark assessment program including the anticipated assessment that will be used (including teacher-designed assessments) as well as the frequency of these assessments." In its initial submission, ISAA responded, "ISAA's formative/benchmark assessment program will depend upon the class and teacher. The assessment may vary depending on the class, lesson, and length of the unit. Assessments will be both formative and summative, allowing teachers to gauge concept mastery before proceeding. Benchmarks from the Core 40 will be followed as ISAA teachers will ensure each concept denoted on the comprehension sheet needed for continuance to the next lesson is achieved. Teachers will ensure students master the content, obtain the skills necessary to retain the content, use a variety of formative and summative assessments including, but not limited to verbal, written, and any assessment deemed appropriate by the given teacher in the given circumstance. Teachers will also tutor students each day for 30 minutes, as needed." After reviewing this response, the Department found the response to be insufficient because ISAA did not demonstrate how its assessments are created, how rigorous its assessments are, how assessments are aligned to Indiana Academic Standards as a component of the school's curriculum, how assessment data is collected and analyzed to inform instruction, how often ISAA intends to administer assessments, nor whether ISAA intends to utilize any national assessments. The Department requested further information regarding ISAA's assessment systems and provided ISAA with an opportunity to respond to the insufficiencies identified by Department staff. In response to the Department's request for additional information, ISAA responded by stating



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“ISAA’s formative/benchmark assessment programs will differ upon the class and teacher. For example, depending on the class, lesson, and length of the unit. Assessments will be both formative and summative, allowing teachers to gauge concept mastery before proceeding. Teachers will tutor students each day for 30 minutes, as needed.” Department staff reviewed the revision response and determined that ISAA did not address any part of the Department’s request and instead merely restated the information already provided in its initial petition. Specifically, ISAA failed to explain whether it uses any nationally recognized assessments, how its assessments are created, how it ensures assessments are both rigorous and aligned to Indiana Academic Standards, how its assessments align to its curriculum, how often formative or summative assessments are given, or how ISAA collects, analyzes, and utilizes assessment data to inform instruction. ISAA’s response was insufficient because it did not demonstrate ISAA has a clearly established assessment system to design and administer rigorous assessments aligned to both its curriculum and Indiana Academic Standards, nor a process to analyze and utilize data from such assessments to inform its instruction.

- **Budget:** The petition for state accreditation requests the applicant to, “Provide, as an attachment, a summary of the proposed budget for the school during the first year of operations as an accredited school. Describe the anticipated cost of tuition and fees, the overall anticipated revenue based on expected enrollment, and a summary of expenses.” ISAA did not provide a fixed rate of tuition in its initial application, stating “...tuition prices, as well as expenditures, may increase or decrease depending on market factors. If ISAA were to take part in the Indiana Choice Scholarship Program and a set tuition is necessary, we can provide a revised tuition, if necessary, after consulting with the Indiana Department of Education on what impact the Indiana Choice Scholarship Program would have on tuition price.” Since a set tuition amount is necessary to participate in the Indiana Choice Scholarship Program and ISAA listed various amounts for tuition in its initial budget, Department staff requested such information from ISAA. ISAA neither addressed, nor responded to the Department’s request, only writing “ATTACH PROPOSED BUDGET” on its response document. After reviewing the response document and related attachments, Department staff were unable to find any proposed budget, revised or otherwise, that indicated a fixed tuition rate for ISAA students. ISAA’s response was insufficient because it failed to respond to Department staff’s requests for information regarding the cost of tuition for ISAA.
- **Instructional Methods:** The petition for state accreditation requests the applicant to, “Describe the systematic methods that will be used to meet the needs of all students and provide equitable and challenging experiences for all students, including but not limited to students with special needs and high ability students. If applicable, provide a description of how the school’s curriculum offers a student the opportunity to earn an Indiana diploma pursuant to IC 20-32-4.” ISAA responded “ISAA will offer both honors and regular courses to meet the needs of students at different academic levels and abilities. The ISAA placement test/entrance exam gives the staff, with reasonable assurance, which classes to place a given student in. We approximate a 10:1 student-to-



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teach[sic] ratio in year one, which will help with individual student learning. A mandatory 30-minute SAT/ACT tutoring session each day can also be substituted out for a tutoring session in a given subject. IEPs and other academic learning plans will be accommodated.” After reviewing ISAA’s response, the response was insufficient because it did not demonstrate ISAA’s capacity to serve special education students. The Department requested further information regarding ISAA’s capacity to serve special education students and provided ISAA with an opportunity to respond to the insufficiencies identified by Department staff. In response to the Department’s request for additional information, ISAA did not provide any additional information to sufficiently demonstrate that it had systematic methods to meet the needs of all students. ISAA’s response was insufficient because it did not demonstrate how ISAA had systemic methods to meet the needs of all students, including special education students.

- **Technology:** While the petition for state accreditation does not specifically request the applicant to describe its use of technology, ISAA stated in its initial submission “[ISAA] will operate strictly in-person, with virtual only an option if needed, but not expected,” as well as later stating “ISAA will offer virtual summer school, as needed, if a student is in danger of not obtaining the Core 40 requirements.” ISAA’s response was insufficient because the response did not clearly articulate ISAA’s technological capacity to carry out virtual instruction, nor how ISAA will ensure high-quality instruction is provided in a virtual setting. The Department requested further information regarding ISAA’s technological capacity to provide students with high-quality virtual instruction and provided ISAA with an opportunity to respond to the insufficiencies identified by Department staff. After reviewing the revisions response document and its related attachments, Department staff were unable to identify any response to this request by ISAA. ISAA’s response was insufficient because the response did not clearly articulate ISAA’s technological capacity to carry out virtual instruction, nor how ISAA will ensure high-quality instruction is provided in a virtual setting.

### **Department Recommendation:**

The Department recommends International Soccer Academy of America’s petition for provisional accreditation be denied.